

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) ZHENDI WANG,



Defendants.

) Criminal No. 24cr10034  
)  
) Violation:  
)  
) Count One: Money Laundering Conspiracy  
) (18 U.S.C. § 1956(h))  
)  
) Forfeiture Allegation:  
) (18 U.S.C. § 982(a)(1))  
)  
)

INDICTMENT

COUNT ONE

Money Laundering Conspiracy  
(18 U.S.C. § 1956(h))

The Grand Jury charges:

From in or about July 2019, through in or about August 2023, in the District of Massachusetts, in the Central District of California, in the District of New Jersey, and elsewhere, the defendants,

(1) ZHENDI WANG,



conspired with each other and with others known and unknown to the Grand Jury to:

- (a) conduct and attempt to conduct financial transactions, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, with the intent to promote the

carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

- (b) conduct and attempt to conduct financial transactions, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and
- (c) knowingly engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000, where such property was derived from specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, in violation of Title 18, United States Code, Section 1957.

All in violation of Title 18, United States Code, Section 1956(h).



FORFEITURE ALLEGATION  
(18 U.S.C. § 982(a)(1))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956, set forth in Count One, the defendants,

(1) ZHENDI WANG,  


shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. \$116,004.15 in funds, seized on or about July 29, 2023 from East West Bank Checking Account No. \*2192, held in the name of ;
- b. \$99,201.07 in funds, seized on or about July 29, 2023 from Bank of America Checking Account No. \*1356, held in the name of ;
- c. \$183,869.09 in funds, seized on or about July 29, 2023 from East West Bank Checking Account No. \*2068, held in the name of ZHENDI WANG;
- d. \$5,007.88 in funds, seized on or about July 29, 2023 from East West Bank Savings Account No. \*8226, held in the name of ZHENDI WANG; and,
- e. \$636,438.00 in funds, seized on or about July 29, 2023 from Cetera Investment Services Account No. \*2444, held in the name of ZHENDI WANG;
- f. A dollar amount to be determined and to be entered in the form of a forfeiture money judgment;

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants --

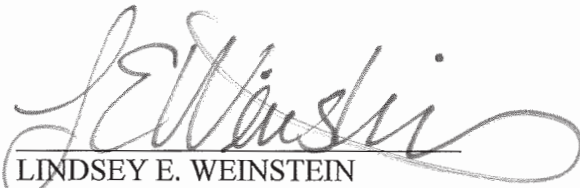
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL

Karlus Pentechnos  
FOREPERSON

  
LINDSEY E. WEINSTEIN  
EVAN D. PANICH  
ASSISTANT UNITED STATES ATTORNEYS  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 1, 2024  
Returned into the District Court by the Grand Jurors and filed.

/s/ Leonardo T. Vieira 3:05pm  
DEPUTY CLERK  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS